

1 Scott E. Gizer, Esq., Nevada Bar No. 12216  
2 *sgizer@earlysullivan.com*  
3 Sophia S. Lau, Esq., Nevada Bar No. 13365  
4 *slau@earlysullivan.com*  
5 EARLY SULLIVAN WRIGHT  
6 GIZER & McRAE LLP  
7 8716 Spanish Ridge Avenue, Suite 105  
8 Las Vegas, Nevada 89148  
9 Telephone: (702) 331-7593  
10 Facsimile: (702) 331-1652

11 Kevin S. Sinclair, NV Bar No. 12277  
12 *ksinclair@sinclairbraun.com*  
13 SINCLAIR BRAUN LLP  
14 16501 Ventura Blvd, Suite 400  
15 Encino, California 91436  
16 Telephone: (213) 429-6100  
17 Facsimile: (213) 429-6101

18 Attorneys for Defendants  
19 FIDELITY NATIONAL TITLE GROUP, INC., CHICAGO  
20 TITLE INSURANCE COMPANY, CHICAGO TITLE OF  
21 NEVADA, INC., FIDELITY NATIONAL TITLE AGENCY OF  
22 NEVADA, INC., and TICOR TITLE OF NEVADA, INC.

23 DESIGNATED LOCAL COUNSEL FOR SERVICE OF  
24 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

25 Gary L. Compton, State Bar No. 1652  
26 2950 E. Flamingo Road, Suite L  
27 Las Vegas, Nevada 89121

28 **UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

BANK OF AMERICA, N.A.,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,  
INC. et al.,

Defendants.

Case No.: 2:21-CV-00353-KJD-NJK

**STIPULATION AND ORDER TO  
EXTEND TIME TO RESPOND TO  
COMPLAINT, REMAND MOTION,  
AND FEES MOTION (ECF NOS. 1, 7,  
AND 8)**

**FIRST REQUEST**

COMES NOW defendants Fidelity National Title Group, Inc. ("FNTG"), Chicago Title Insurance Company ("CTIC"), Chicago Title of Nevada, Inc. ("Chicago Agency"), Fidelity National Title Agency of Nevada, Inc. ("Fidelity Agency"), and Ticor Title of Nevada, Inc.

1 (“Ticor Agency”) (collectively, “Defendants”), and plaintiff Bank of America, N.A. (“Bank of  
2 America”) (collectively with Defendants, the “Parties”), by and through their respective attorneys  
3 of record, which hereby agree and stipulate as follows:

4 1. On March 1, 2021 Bank of America filed its complaint in the Eighth Judicial  
5 District Court for the State of Nevada;

6 2. On March 1, 2021, CTIC removed the instant case to the United States District  
7 Court for the State of Nevada (ECF No. 1);

8 3. Chicago Agency’s, Ticor Agency’s, and CTIC’s responses to Bank of America’s  
9 complaint are currently due on April 13, 2021;

10 4. Bank of America filed a motion to remand and a motion for fees (ECF Nos. 7 and  
11 8);

12 5. Defendants’ deadline to respond to the motion to remand and the motion for fees is  
13 currently April 14, 2021;

14 6. The Parties are in the process of formalizing a stipulation to stay this case pending  
15 the appeal in *Wells Fargo Bank, N.A. v. Fidelity National Title Ins. Co.*, Ninth Cir. Case No. 19-  
16 17332 (District Court Case No. 3:19-cv-00241-MMD-WGC);

17 7. Defendants request a two-week extension of these deadlines to afford the Parties  
18 additional time to formalize their stipulation to stay this case;

19 8. Counsel for Bank of America does not oppose the requested extension;

20 9. This is the first request for an extension made by Defendants, which is made in  
21 good faith and not for the purposes of delay.

22 10. This stipulation is entered into without waiving any of Defendants’ objections  
23 under Fed. R. Civ. P. 12.

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1           **IT IS SO STIPULATED** that CTIC's, Chicago Agency's, and Ticor Agency's deadline  
2 to respond to the complaint is hereby extended through and including Monday, April 27, 2021,  
3 and Defendants' deadline to respond to the motion to remand and the motion for fees (ECF Nos. 7  
4 and 8) for fees is hereby extended through and including Wednesday, April 28, 2021.

5 Dated: April 12, 2021

SINCLAIR BRAUN LLP

7 By: /s/-Kevin S. Sinclair

8 KEVIN S. SINCLAIR  
9 Attorneys for Defendants  
10 FIDELITY NATIONAL TITLE GROUP,  
11 INC., CHICAGO TITLE INSURANCE  
COMPANY, CHICAGO TITLE OF  
NEVADA, INC., FIDELITY NATIONAL  
TITLE AGENCY OF NEVADA, INC., and  
TICOR TITLE OF NEVADA, INC.

12 Dated: April 12, 2021

WRIGHT FINLAY & ZAK, LLP

14 By: /s/-Darren T. Brenner

15 DARREN T. BRENNER  
16 Attorneys for Plaintiff  
BANK OF AMERICA, N.A.

17 **IT IS SO ORDERED.**

18 Dated this 15th day of April, 2021.

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20 KENT J. DAWSON  
21 UNITED STATES DISTRICT JUDGE  
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